DOWNEY | BRAND
ATTORNEYS LLP

555 Capitol Mall, 10th Floor
Sacramento, CA 95814

P: 916/444-1000
F: 916/444-2100
downeybrand.com

Jane E. Luckhardt
jluckhardt@downeybrand.com

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BY HAND DELIVERY AND MAIL

Dan Leavitt
Deputy Director
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Re: Notice of Preparation of a Program Environmental Impact Report/Environmental Impact Statement for a Bay Area to Central Valley High-Speed Train

Dear Mr. Leavitt:

This letter provides comments on the Notice of Preparation (NOP) for the Program Environmental Impact Report/Environmental Impact Statement for a Bay Area to Central Valley High-Speed Train (EIR/EIS). Consistent with the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) these comments address the scope of the analysis to be contained in the EIR/EIS including the potential significant environmental issues and range of alternatives, mitigation measures and significant effects that should be analyzed in the EIR/EIS. Furthermore, these comments focus on the potential alternative route that passes through the San Antonio and Isabel Valleys (the "San Antonio/Isabel Valley Alternative").

I am writing on behalf of the owners of a 1200-acre ranch located in the Diablo Range on the west side of the San Antonio valley through which the San Antonio/Isabel Valley Alternative passes. This ranch has been in our family since the 1930s. This property is primarily in a natural state. The property has two dwelling units in two separate locations and dirt fire roads that provide access to the remainder of the property. The property includes low mountains with brush and valleys with grassland, trees, creeks and ponds. This area is served by one county road.

The San Antonio and Isabel Valleys lie within a relatively undeveloped area in the Diablo Range between Pacheco Pass to the south, Altamont Pass to the north, the Central Valley to the east and the Santa Clara Valley to the west. This area includes Coe Park and Grant Park along with numerous large ranches that have not been subdivided. The area supports wildlife including large herds of elk, antelope, deer, and numerous birds. The area was also home to Native Americans and numerous artifacts remain from that time.

The current proposals for the San Antonio/Isabel Valley Alternative show short tunnel sections through low mountains and daylight sections in the valleys. The daylight section through the San Antonio Valley is estimated to be 165 feet above the valley floor. In order to support this elevated track we understand that an earthen berm will be built taking a 380-foot wide swath of land through the valley. In some places a 380-foot wide berm will fill the entire valley. A structure of this size will have a profound impact to a currently undeveloped and relatively undisturbed valley.

The potential subdivision of this large undeveloped area by the San Antonio/Isabel Valley Alternative creates numerous environmental impacts. In order to adequately assess those impacts the scope of the EIR/EIS should include a detailed analysis of all of the following:

1. The environmental impact of splitting this large undeveloped land area into two separate and distinct areas. The analysis should explore the impacts to wildlife that need the combined larger area to maintain a healthy population. Currently, a herd of approximately 50 elk live in the San Antonio Valley. They use the entire Valley moving from one section to another throughout the year. The 165-foot elevated train track would completely block and discourage movement up and down the valley decreasing the area available to the herd and threatening its long term survival.

2. The visual impact of adding a large distinctive linear feature to an undeveloped area. The tracks will be lined with chain link fence and razor wire to keep people and animals off the track. The tracks will be built on top of a berm 165 feet above the valley creating a strong linear feature. The train tracks with dominate the view in the valley. The strong linear element will clash with the existing mountains and valley. Even if vegetation is planted along the berm, the dry environment of the San Antonio Valley will extend the time required for any vegetation to become established enough to soften this view, and it will be impossible for vegetation to hide a structure of this size. The visual impact will be significantly obvious to those who live and visit the area.

3. The impact from disturbance of cultural resources during construction of the track and supporting structures. Native American resources are often located near water sources in valleys. Since the daylight sections of the track are in valleys near and across water sources, construction of these facilities will disturb Native American remains and artifacts. Archeologists have conducted little formal study of these areas. Covering these artifacts such that they cannot be recovered or failing to study and analyze artifacts found during construction must be analyzed.

4. The environmental impact of each train climbing to the elevation of the Isabel Valley of 2300 to 2400 feet and then descending into the Santa Clara Valley or Central Valley. The electricity to power these trains 24 hours a day will be created from power plants located inside or outside of the state. The incremental energy needed to power 64 trains a day up and over this area will create an additional increment of air pollution, water use

and consumption of natural resources. The amount of additional pollution, water use, etc. should be quantified for evaluation against other alternative routes.

5. The environmental impacts from the noise caused by the 64 trains planned to traverse this route each weekday. The San Antonio Valley is very quiet. Currently the siren from the Sheriff's car on Mount Hamilton can be heard to the San Joaquin/ Santa Clara County line. The county road has little traffic, and there is no industry in the valley. The houses are few and spread apart by open country. The sound levels created by this semi-constant train traffic will shatter the quite that currently fills this valley. The addition of this loud and constant sound level will also impact wildlife living near the tracks in the valleys where the train daylights and throughout the area.

6. The impact of construction of the track and tunnels on underground and above ground water sources. The San Antonio Valley is dry for part of the year. Losing a water source would severely impact the ability of wildlife to sustain itself in the valley.

7. The impact of an additional public safety hazard. Currently, the valley does not have a resident sheriff, fire department or paramedics along this route. Therefore, no one is authorized to call in a life flight helicopter. If someone is seriously injured along the route, it would be hours before that person could receive intensive medical attention.

8. The growth inducing impacts of this new transportation corridor must be considered. Regardless of station locations, construction of this corridor will begin to open this country to development. It will reduce the game and tranquility that has keep this area undeveloped and held in families for generations. Developers will take advantage of the relatively short distance between the bay area and these valleys and improve roads to allow easy commutes between this area and the developed Santa Clara Valley. These impacts must be considered in a realistic manner given the proximity of this area to the bay area.

Each of these impacts needs to be fully evaluated when a project plans to create a new transportation corridor in an area that currently does not contain such features. Adding the train along this proposed alternative will permanently change the rural character of the area, shatter the quite that currently exists and disturb the wildlife. Based upon these impacts, the EIR/EIS should also evaluate the following alternative and/or mitigation measure:

- A route that tunnels from the Central Valley to the Santa Clara Valley. A tunnel would avoid the disturbance to these pristine areas and avoid the change in elevation required to daylight in the San Antonio and Isabel Valleys. This alternative would require 12 miles of tunnel, which is feasible with a third bore to equalize pressure.

The San Antonio/Isabel Valley route alignment considered engineering economy only. The final alignment should consider minimizing environmental impacts. We appreciate the High-Speed

Rail staff visiting both the San Antonio and Isabel Valleys. In order to accurately assess the potential impacts from construction of this alternative, it is imperative that staff and their environmental consultants visit these beautiful places.

Very truly yours,

DOWNEY BRAND LLP

Jane E. Luckhardt

Jane E. Luckhardt

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cc: Charles Luckhardt, Jr.
Charley Luckhardt
John Luckhardt